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REMARKS**INTRODUCTION:**

In accordance with the foregoing, claims 1, 3, 4, 9, 12, 14, 17, 19-21, 24, and 27-51 have been canceled without prejudice or disclaimer, and claims 2, 5-8, 10, 11, 13, 15, 16, 18, 22, 23, 25, and 26 have been amended. No new matter is being presented, and approval and entry are respectfully requested.

Claims 2, 5-8, 10, 11, 13, 15, 16, 18, 22, 23, 25, and 26 are pending and under consideration.

RESTRICTION/ELECTION:

In the Office Action, at page 2, item 1, the Examiner required affirmation of the provisional election made July 22, 2005. Applicants hereby affirm election of Group I, claims 1-26.

CLAIM OBJECTIONS:

In the Office Action, at page 3, item 2, the Examiner objected to claims 1-26. Applicants respectfully submit that the amendments overcome the Examiner's objections.

REJECTION UNDER 35 U.S.C. §112:

In the Office Action, at page 4, item 3, the Examiner rejected claims 1-26 under 35 U.S.C. §112, first paragraph, for the reasons set forth therein. The reasons for the rejection are set forth in the Office Action and therefore not repeated. Applicants traverse this rejection and respectfully request reconsideration.

At page 22, lines 15-18, the subject Specification recites: "[a] local area network 60 within a business establishment 2 is connected with a computer forming each of the virtual workshop system 11 and the remote monitoring system 51 and a computer forming a facility database 17 and a product database 18."

Applicants respectfully submit that one of ordinary skill in the art would understand that the virtual workshop system 11 is a computer, and thus, since the virtual workshop authoring means 22 is an element of the virtual workshop system 11 (see FIG. 1), that the virtual workshop authoring means 22 is computer software.

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At page 22, lines 3-6, the subject Specification recites: "[r]eferring to Fig. 1, the virtual workshop authoring means 22 is a means for formulating the virtual workshop 21 of the data model capable of being simulated by the simulating means 23, based on the data associated with the facilities stored in a facility database."

Applicants respectfully submit that one of ordinary skill in the art would understand that it is not necessary for the virtual workshop authoring means 22 to have a user interface, but that the virtual workshop authoring means 22 must be able to use the data in the facility database, e.g., facility database 17 (see FIG. 3).

Further, given the disclosure of page 7, lines 18-25, to which the Examiner points, as well as the above-noted section on page 22, lines 3-6, Applicants respectfully submit that one of ordinary skill in the art would also understand that the virtual workshop authoring means 22 communicates with the simulating means 23, (which, as an element of the virtual workshop system 11 (see FIG. 1) would also be understood to be software) and that the simulating means 23 provides a user interface.

Additionally, given the Specification, e.g., at p. 26, lines 9-15, and page 27, line 25 to p. 28, line 15, Applicants respectfully submit that one of ordinary skill in the art would also understand that the simulating means 23 provides a user interface to set and adjust simulated operating conditions, and that the simulating means 23 simulates the production stat and physical distribution state of facilities under such set and/or adjusted conditions, and displays results of such simulation to a user.

Applicants respectfully submit that they have made a bona fide attempt to comply with the Examiner's request for assistance, and will gladly provide further assistance.

In the Office Action, at page 6, item 4, the Examiner rejected claims 1-26 under 35 U.S.C. §112, second paragraph, for the reasons set forth therein. The reasons for the rejection are set forth in the Office Action and therefore not repeated. Applicants traverse this rejection and respectfully request reconsideration.

Applicants respectfully submit that the amendments overcome the Examiner's rejections.

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REJECTION UNDER 35 U.S.C. §102:

In the Office Action, at page 12, item 7, the Examiner rejected claims 1, 2, 13, 17, and 18 under 35 U.S.C. §102(b) as being anticipated by "process Subsystem Architecture for Virtual Manufacturing Validation" by J. Michael Griesmeyer and Fred J. Oppel, III (hereinafter Griesmeyer). The reasons for the rejection are set forth in the Office Action and therefore not repeated. Applicants traverse this rejection and respectfully request reconsideration.

Griesmeyer discloses a process control architecture for validating manufacturing modeling by employing the same control software in both the actual manufacturing and the modeled manufacturing. (See Griesmeyer, at Abstract).

In more detail, Griesmeyer discloses formulating a virtual model of a production process and verifying the virtual model (see Griesmeyer, at §§4 and 3.1.1), the verifying including simulating the production process and running the simulation (see Griesmeyer, e.g. at §3.1.1, and 3.2).

Thus, Griesmeyer discloses a computer executable program that simulates software operation.

In contrast, the claimed invention simulates the production state and the physical distribution state to verify the virtual workshop. Accordingly, the object of the verification is quite different.

Applicants respectfully submit that independent claims 2, 13, and 18 patentably distinguish over the cited art, and should be allowable for at least the above-mentioned reasons. Further, Applicants respectfully submit that claims 5-8, 10, 11, 15, 16, 22, 23, 25, and 26, which variously depend from independent claims 2, 13, or 18, should be allowable for at least the same reasons as claims 2, 13, and 18, as well as for the additional features recited therein.

CONCLUSION:

In accordance with the foregoing, Applicants respectfully submit that all outstanding objections and rejections have been overcome and/or rendered moot, and further, that all pending claims patentably distinguish over the cited art. Thus, there being no further outstanding objections or rejections, the application is submitted as being in condition for allowance which action is earnestly solicited.

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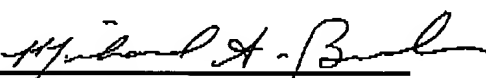
If the Examiner has any remaining issues to be addressed, it is believed that prosecution can be expedited by the Examiner contacting the undersigned attorney for a telephone interview to discuss resolution of such issues.

If there are any underpayments or overpayments of fees associated with the filing of this Amendment, please charge and/or credit the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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Date: December 5, 2005

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CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this correspondence is being transmitted via facsimile to: Commissioner for Patents,
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STAAS & HALSEY

By: EVERETT B. HOGEDate: 12/05/05